

HUESTON HENNIGAN LLP
John C. Hueston, State Bar No. 164921
jhueston@hueston.com
Moez M. Kaba, State Bar No. 257456
mkaba@hueston.com
Yahor Fursevich, State Bar No. 300520
yfursevich@hueston.com
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340
Facsimile: (888) 775-0898

Attorneys for Plaintiff
Palantir Technologies Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

PALANTIR TECHNOLOGIES INC., a
Delaware corporation,

Plaintiff,

vs.

MARC L. ABRAMOWITZ, in his individual
capacity and as trustee of the MARC
ABRAMOWITZ CHARITABLE TRUST
NO. 2, KT4 PARTNERS LLC, a Delaware
limited liability company, and DOES 1 through
50, inclusive,

Defendants.

Case No. 5:19-cv-06879-BLF

**DECLARATION OF YAHOR FURSEVICH
IN SUPPORT OF PALANTIR
TECHNOLOGIES INC.'S OPPOSITION TO
DEFENDANTS' MOTION FOR AN ANTI-
SUIT INJUNCTION**

Date: March 19, 2020
Time: 9:00 a.m.
Courtroom 3 (5th Floor)
Judge: Hon. Beth L. Freeman

DECLARATION OF YAHOR FURSEVICH

I, Yahor Fursevich, hereby declare as follows:

1. I am an attorney at the law firm of Hueston Hennigan LLP, counsel of record for Palantir Technologies Inc. ("Palantir") in the above-captioned matter. I make this declaration in support of Palantir's Opposition to Defendants' Motion for an Anti-Suit Injunction. Except as otherwise stated, the representations made in this declaration are based on my personal knowledge, and if called upon to do so, I could and would testify competently to the facts stated herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the May 21, 2019 Order Denying Defendants' Motion for an Anti-Suit Injunction.

3. Attached hereto as **Exhibit B** is a true and correct copy of Marc L. Abramowitz's Opposition to Palantir's *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings, filed September 7, 2018.

4. Attached hereto as **Exhibit C** is a true and correct copy of Marc L. Abramowitz's Sur-Reply to Palantir's *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings, filed September 28, 2018.

5. Attached hereto as **Exhibit D** is a true and correct copy of Marc L. Abramowitz's Supplemental Brief in Opposition to Palantir's *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings, filed October 18, 2019.

6. Attached hereto as **Exhibit E** is a true and correct copy of the November 22, 2019 Order Granting 28 U.S.C. § 1782 Application.

7. Attached hereto as **Exhibit F** is a true and correct copy of Marc L. Abramowitz's Notice of Motion and Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge, filed December 6, 2019.

8. Attached hereto as **Exhibit G** is a true and correct copy of the December 17, 2019 Order Denying Marc L. Abramowitz's Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge.

10. Attached hereto as **Exhibit I** is a true and correct copy of the October 28, 2019 Letter from Jack P. DiCanio to Susan S. Miller, Court Executive Officer for the Sixth District Court of Appeal.


11. Attached hereto as **Exhibit J** is a true and correct copy of Defendants' October 11, 2016 Notice of Removal.

9 12. Attached hereto as **Exhibit K** is a true and correct copy of the Court's March 9,
10 2017 Order Granting Motion to Remand.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed on February 11, 2020 in Los Angeles, California.

14 HUESTON HENNIGAN LLP

15
16 By: 
17 Yahor Fursevich
Attorney for Plaintiff
PALANTIR TECHNOLOGIES INC.